

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

GERALD W. CORDER,

Plaintiff,

v.

ANTERO RESOURCES CORPORATION,  
a Delaware corporation,

Defendant.

Civil Action No. 1:18-CV-30  
Hon. Judge Irene M. Keeley

c/w 1:18CV31, 1:18CV32,  
1:18CV33, 1:18CV34, 1:18CV35,  
1:18CV36, 1:18CV37, 1:18CV38,  
1:18CV39, 1:18CV40 for purposes of  
discovery and setting schedule

AFFIDAVIT OF DANIEL T. REINEKE

Now comes Daniel T. Reineke, in the above styled litigation, and represents to this Honorable Court the following:

1. I am over the age of majority and competent to testify to the matters contained herein. Unless otherwise specified, my testimony is based on personal knowledge.
2. I was retained by plaintiffs' counsel as an expert in this case on behalf of plaintiffs.
3. I previously provided an affidavit confirming my opinions under oath, as set forth in my reports dated February 10, 2020, Exhibit 2 to my affidavit and September 25, 2020, Exhibit 3 to my affidavit. I refer to both of those reports and exhibits.
4. See also, my report dated September 25, 2020 with respect to my experience in the oil and gas industry, including responsibility of producers with respect to paying royalty and duties related thereto. *See exhibit 3, p. 2 to my February 5, 2021 affidavit, Report dated September 25, 2020.* Also, I set forth the numerous data, document and deposition testimony that has been provided in discovery in this case. I referred to the documents and my findings and opinions with respect to Antero's operations and methods of paying royalties. *See exhibit 2, pp.*

*3-6 to my February 5, 2021 affidavit, Report dated February 10, 2020.* I also set out the relevant leases and agreements, as well as my opinion concerns the new data on pp. 9-12.

5. I was recently requested by plaintiffs' counsel to provide my findings and opinions in this case concerning whether the products produced from the wells which were drilled on plaintiffs' leases were a marketable product or in marketable condition at the well head, without midstream services. I understand that the producer, Antero, claims that the product, which were produced at the wellhead could be sold at the wellhead without processing, and therefore is a marketable product at the wellhead. To a reasonable degree of certainty, based upon review of the records and evidence, my experience, education and training, the gas is not a marketable product at the wellhead. Raw gas at the wellhead needs at least one midstream service (gathering, compression, dehydration, treating and processing) to remove the impurities before it is allowed into the interstate pipeline. *See exhibit 2, p. 4 to my February 5, 2021 affidavit, Report dated February 10, 2020.*

6. The production from the plaintiffs' wells can be transformed into a marketable product after midstream services are provided. The raw gas stream exiting the wellhead contains a mixture of numerous elements and substances, some valuable and some not. Some are harmful to humans and to the gas pipelines and equipment. Not surprisingly, the harmful, worthless, and valuable products must be segregated, and the valuable products transformed into marketable products and sold. *See exhibit 2, p. 3 to my February 5, 2021 affidavit, Report dated February 10, 2020.*

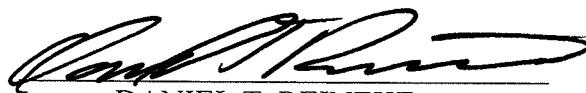
7. My opinion to a reasonable degree of certainty is that this gas is not a marketable product at the wellhead and midstream services must be provided in order to sell that gas and its byproducts. One of the byproducts is NGLs (Natural Gas Liquids) that are recovered by

processing the raw gas. Processing, one of the midstream services listed above, is required when the HDP (Hydrocarbon Dew Point) of the gas does not meet the quality requirement of the interstate pipeline.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 25<sup>th</sup> day of February, 2021.

FURTHER THE AFFIANT SAYETH NAUGHT:



DANIEL T. REINEKE

STATE OF OKLAHOMA,

COUNTY OF OKLAHOMA to-wit:

The foregoing instrument was acknowledged before me this 25<sup>th</sup> day of February, 2021, by DANIEL T. REINEKE.

My commission expires: March 9, 2025.



NOTARY PUBLIC